Annual 47 C.F.R. §64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: GlobalTel LD, Inc. d/b/a American Roaming Network

Form 499 Filer ID: 818016

Date Filed: February 27, 2009

Name of Signatory: Milton Volz

Title of signatory: President

I, Milton Volz, certify that I am an officer of the company named above, and, acting as an agent for the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Respectfully submitted.

Milton Volz, President

GlobalTel LD, Inc. d/b/a American Roaming Network

GlobalTel LD, Inc. d/b/a American Roaming Network Statement of CPNI Operating Procedures

GlobalTel LD, Inc. d/b/a American Roaming Network ("ARN") is a manual roaming service provider.

ARN has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that ARN is compliance with the FCC's customer proprietary network information ("CPNI") rules. This statement is summary of ARN's policies and procedures designed to safeguard CPNI.

Specifically, ARN has ensured that its customer service employees do not have any access to customer data for any purpose. ARN does not have access to customer information in general, but rather renders the billing information for its calls directly to the wireless carrier providing the connection or to its own billing agent, BSG Clearing. ARN does maintain customer data on premises relating to its credit card transactions, and complies with all privacy requirements dictated by its processing agreements. Further, ARN has outsourced all billing and most customer service functions to a third party clearinghouse, BSG Clearing. ARN's in-house customer service only provides rate information or responds to requests for prepaid services paid by credit card. These customer service representatives do not have any access to customer data or call records. ARN has obtained verification from its third party clearinghouse that it complies with the FCC's CPNI requirements.

ARN, through its billing vendor, uses CPNI for the limited purposes of initiating, rendering, billing, and collecting telecommunications services, and may use CPNI, if necessary, to protect its property rights. ARN does not use any CPNI for any marketing purposes. Nor does ARN disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

ARN trains its personnel in the use of CPNI, and explains that its customer service personnel does not have access to CPNI. ARN has an express disciplinary process in place for any improper use of CPNI.

ARN has implemented measures to discover and to protect against unauthorized attempts to access CPNI. ARN also has implemented procedures pursuant to which it will track breaches of CPNI (and will be notified by its clearinghouse of any such breaches), and it will notify the United States Secret Service and the Federal Bureau of Investigation. ARN will notify its customers (if permitted) of the security breach, and will notify of the breaches and notifications for a two-year period.

ARN will track customer complaints regarding CPNI.

ARN will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

DECLARATION OF MILTON VOLZ

- I, Milton Volz, am over the age of 18, do hereby declare:
- I am the President of GlobalTel LD, Inc. d/b/a American Roaming Network. My business address is 7999 North Federal Highway, 4th Floor, Boca Raton, Florida 33487.
- I have personal knowledge of the information in the attached. I declare under penalty of perjury that the information contained in the attached letter is true and correct.

Executed on February 27, 2009

WCSR 4081080v1